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Attorneys for Defendant
 BLUE CROSS OF CALIFORNIA dba ANTHEM
 BLUE CROSS

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

CHRIS W. & JENNIFER W.,
 Plaintiffs,

v.

PROVIDENCE HEALTH PLAN; BLUE
 CROSS OF CALIFORNIA dba ANTHEM
 BLUE CROSS; and DOES 1 through 10,
 Defendants.

Case No. 3:20-cv-04491-JCS

**JOINT STIPULATION AND ~~PROPOSED~~
 ORDER EXTENDING TIME TO
 RESPOND TO PLAINTIFF'S
 COMPLAINT**

Judge: Hon. James Donato

Current response date: September 14, 2020
 New response date: October 5, 2020

1 Pursuant to Northern District of California Local Rule 6-1(b), Plaintiffs Chris W. and
2 Jennifer W. ("Plaintiffs") and Defendant Blue Cross of California dba Anthem Blue Cross
3 ("Anthem"), by and through their counsel of record, respectfully submit this Stipulation and
4 Proposed Order to extend time to respond to Plaintiffs' complaint from September 14, 2020 to
5 October 5, 2020. In support of this stipulation, the Parties state as follows:

6 1. This Complaint was filed on July 7, 2020.

7 2. Plaintiffs mailed a Request for Service of Summons to Anthem on July 16, 2020,
8 Anthem returned the Request for Service of Summons to Plaintiffs on July 22, 2020, making
9 Anthem's current deadline to respond to the Complaint September 14, 2020.

10 3. The Plaintiffs and Anthem have met and conferred, and have agreed to extend the
11 date upon which Defendant's responsive pleading is due to October 5, 2020.

12 4. Plaintiff and Anthem have stipulated to extend the deadline for Anthem to respond
13 to response to the Complaint from September 14, 2020 to October 5, 2020 for purposes of
14 exploring potential early resolution of these claims prior to incurring further attorneys' fees and
15 litigation expenses.

16 5. This is the first request for an extension for this responsive pleading, and the
17 requested extension is not expected to prejudice either party.

18 9. Pursuant to Northern District of California Local Rule 6-2, and for good cause, the
19 Parties hereby stipulate and respectfully request that this Court extend the time Anthem to
20 respond to the Complaint to October 5, 2020.

Dated: September 3, 2020

TROUTMAN PEPPER HAMILTON
SANDERS LLP

By: /s/ Chad S. Fuller

Chad Fuller
Jenna Uyen Nguyen
Attorneys for Defendant
BLUE CROSS OF CALIFORNIA dba
ANTHEM BLUE CROSS

Dated: September 3, 2020

DL LAW GROUP

By: /s/David M. Lilienstein

David M. Lilienstein
Katie J. Spielman
Attorneys for Plaintiffs
CHRIS W. & JENNIFER W.

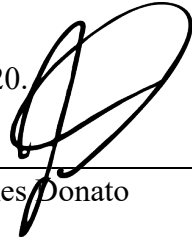
Filer's Attestation: Pursuant to Civil L.R. 5-1(i)(3) regarding signatures, Chad R. Fuller hereby attests that concurrence in the filing of this document and its content has been obtained from all signatories listed.

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~~PROPOSED~~ ORDER

IT IS SO ORDERED, Defendant Blue Cross Of California dba Anthem Blue Cross's response to the Complaint shall be filed by October 5, 2020.

ORDERED this 4th day of _____ September _____, 2020.



The Honorable James Donato